BINGHAM

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November 16, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: **EX PARTE NOTICE**

Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band, WT Docket No. 08-166; Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition, WT Docket No. 08-167; Amendment of Parts 15, 74 and 90 of the Commission's Rules Regarding Low Power Auxiliary Stations, Including Wireless Microphones, ET Docket No. 10-24; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On November 14, 2012, Shure Incorporated ("Shure") met with Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety to Commissioner Clyburn, to discuss the above-referenced dockets. Attending this meeting on behalf of Shure were Mark Brunner, Senior Director, Global Public Relations, Ahren Hartman, Director, Axient Wireless Engineering and Edgar Reihl, Director of Spectrum Strategy, along with Catherine Wang and Tim Bransford of Bingham McCutchen LLP, outside counsel to Shure.

During this meeting, Shure provided an overview of wireless microphone use models and technological advancements that have occurred over the last 5-10 years. Shure highlighted the fact that along with advances in microphone technology, demand and use of wireless microphones in increasingly sophisticated media productions have expanded. We explained that audio quality is paramount for professional wireless microphone users, and is affected by a number of technical factors. We discussed Shure's strong view that continued access to clear UHF spectrum is critical to wireless microphone operation, and key to ensuring United States leadership in media and content creation. Finally, we discussed the proposed changes to the Commission's Rules and the UHF frequency allocation under consideration in the Wireless Microphone Proceeding and Incentive Auction docket.

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If you have any questions regarding this meeting, please do not hesitate to contact the undersigned. A copy of the attached presentation was discussed during the meeting.

Very truly yours,

/s/

Catherine Wang Tim Bransford

Attachment CC:

Louis Peraertz

Wireless Microphone Technology

FCC - OET 14 November 2012

Ahren J. Hartman
Director, Axient Wireless Engineering



Types of UHF Wireless Audio Products



Wireless Microphones



Wireless Intercoms



Wireless Personal Monitors



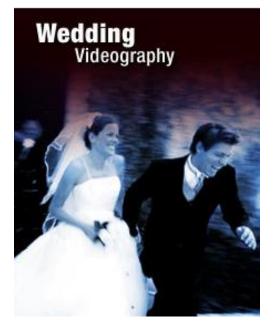
Wireless IFBs

Small Wireless Venues

School Performances



Event Videography



Medium Wireless Venues

Music Tours



Corporate Meetings



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Large Wireless Venues

Houses of Worship



Theater Productions



)

Extreme Wireless Venues

Global Sporting Events



Political Conventions



Auto Shows



Technical factors affecting microphone spectrum efficiency in the TV bands

Audio Quality

RF Output Power

RX Selectivity

TX Occupied BW

TX-TX IMD

Audio Quality

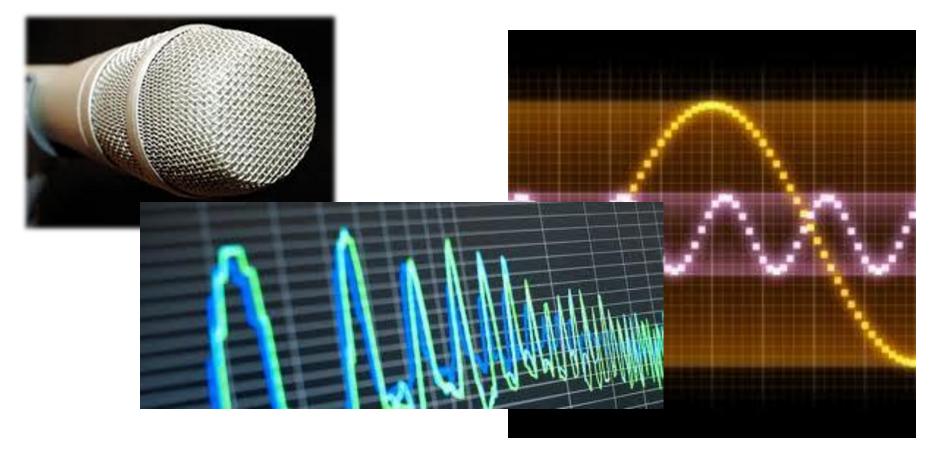
RF Output Power

RX Selectivity

TX Occupied BW

TX-TX IMD

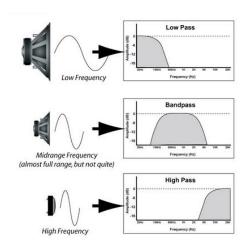
Audio Quality

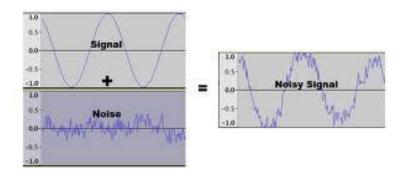


Audio quality is the leading ingredient in wireless microphone performance.

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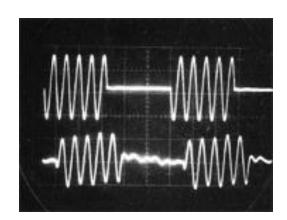
Audio Quality Measures



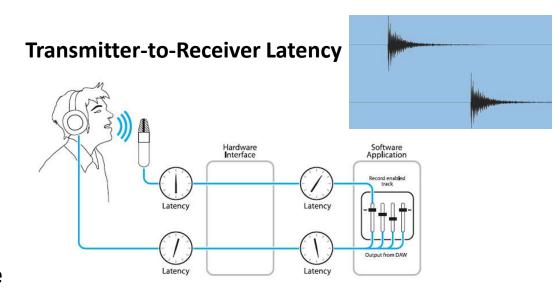


Signal-to-Noise Ratio

Signal Bandwidth



Distortion and Transient Response



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Audio Quality RF Output Power RX Selectivity TX Occupied BW TX-TX IMD

RF Output Power

Transmitter RF output power is influenced by operating distance and harmful interference levels

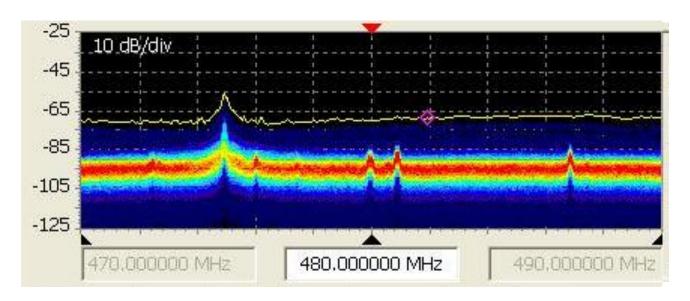




Music Video Wall

Broadband Noise

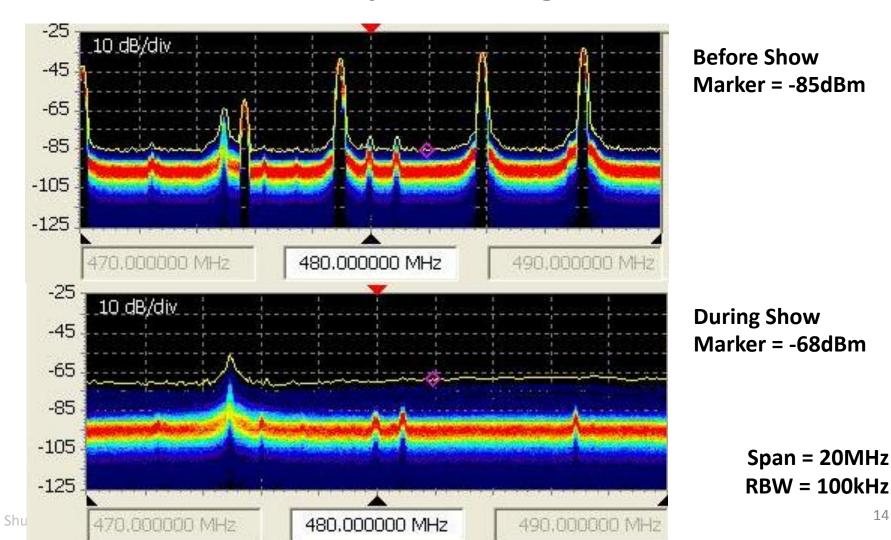
RTA scans from major touring concert venue



Before Show Marker = -85dBm During Show Marker = -68dBm (Delta = +18dB)

> Span = 20MHzRBW = 100kHz

Broadband Noise RTA scans from major touring concert venue



Audio Quality

RF Output Power

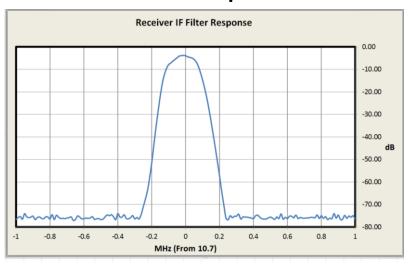
RX Selectivity

TX Occupied BW

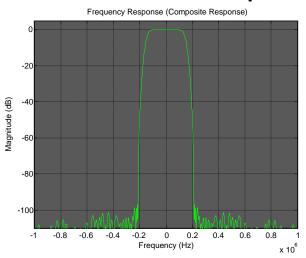
TX-TX IMD

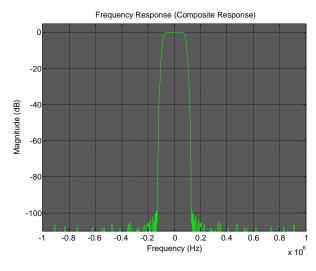
Receiver Selectivity

Receiver IF Filter Example #1



Receiver IF Filter Example #2





Audio Quality RF Output Power RX Selectivity TX Occupied BW TX-TX IMD

TX Occupied Bandwidth

Analog FM (130KF3E)



Digital (165KD1E)



Hybrid Digital-FM (180KF3E)

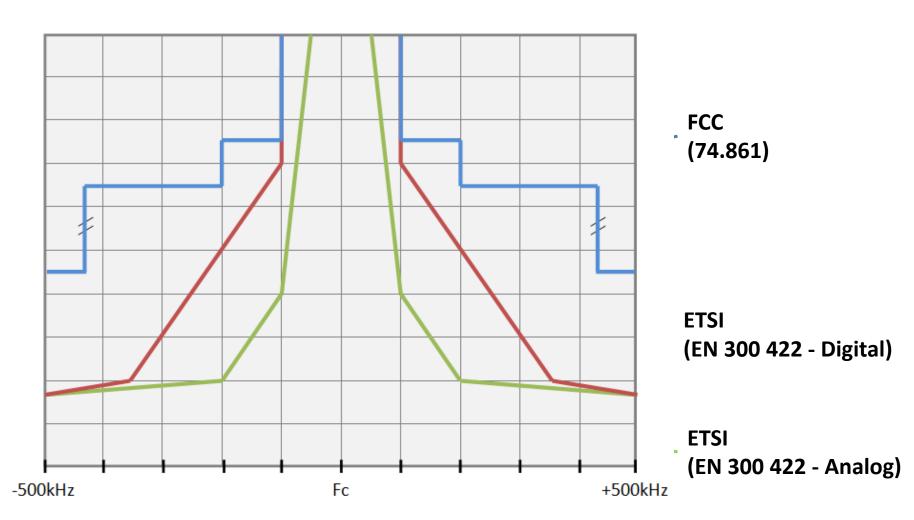




Digital (171KF1W)

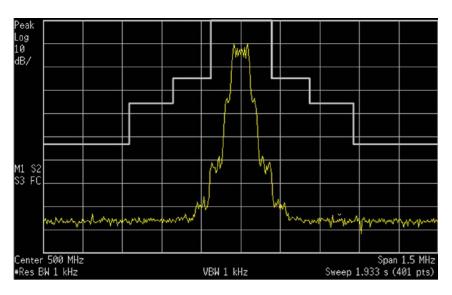


Regulatory TX BW Masks (UHF)



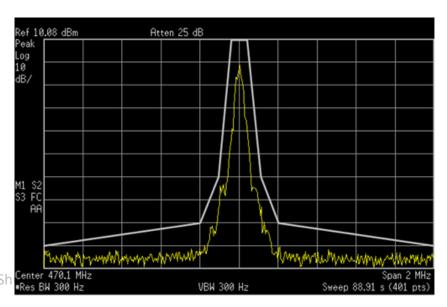
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Wireless TX Spectrum



FCC (74.861)
Analog Example

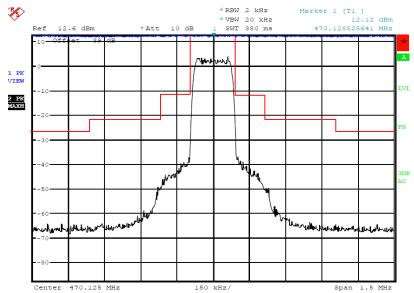




ETSI (EN 300 422) Analog Example

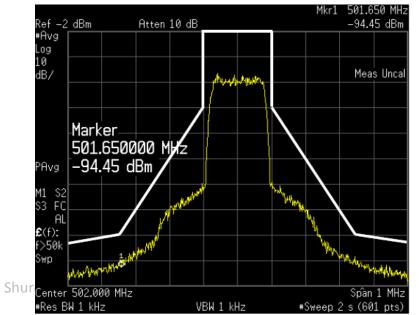


Wireless TX Spectrum



FCC (74.861)
Digital Example

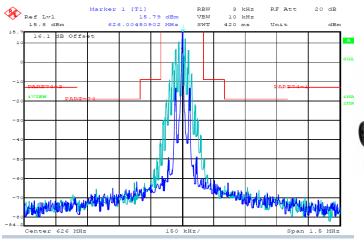




ETSI (EN 300 422) Digital Example



Wireless TX Spectrum

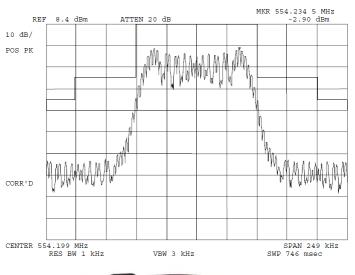




VBW 5 NH: 102.81 dBpV Ref 127 dBpV *Att 0 dB SWT 50 ms 576.000000000 MHz Office 20 dB Temp 1 [T1 0 MW] 90 78 dBpV Temp 1 [T1 0 MW] 2 PK VIEW Temp 2 [T1 0 MW] 2 PK VIEW Center 576 MHz 20 kHz/ Span 200 kHz



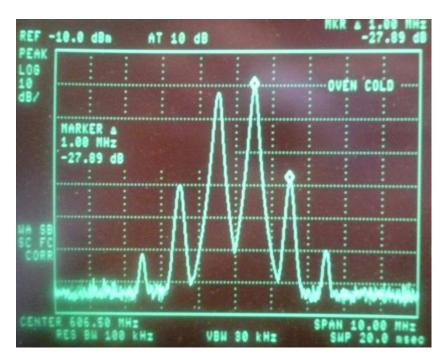
Analog FM Examples





Audio Quality RF Output Power RX Selectivity TX Occupied BW **TX-TX IMD**

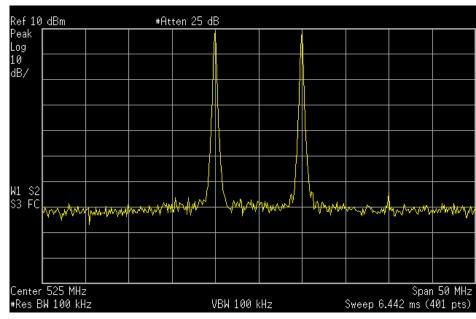
Transmitter-to-Transmitter IMD



Two Transmitter Example #1

Microphone systems are FDMA and therefore always transmitting

Two Transmitter Example #2



Summary

- Audio quality is paramount in wireless microphones
- Microphone technology has advanced dramatically in the last 5-10 years and will continue
- Spectral efficiency is increasing; more channels required in less available spectrum
- Clear UHF spectrum is critical for successful microphone operation